

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MARYLAND
(Greenbelt Division)**

In re:

(Chapter 11)

Prepaid Wireless Group, LLC,¹

Case No. 24-18852 (___)

Debtor.

REQUEST FOR EMERGENCY HEARING

Prepaid Wireless Group, LLC, the debtor and debtor-in-possession in the above-captioned chapter 11 case (the “Debtor”), by its undersigned proposed counsel, requests that the Court conduct an emergency hearing on two “first-day motions,” as set forth below, and in support of this Request, states as follows:

1. On October 21, 2023, the Debtor filed its voluntary petition for relief under chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”). The Debtor has remained in possession of its property and continues to manage its financial affairs as a debtor in possession pursuant to Sections 1107 and 1108 of the Bankruptcy Code.

2. In conjunction with the filing of the voluntary petition for relief, the Debtor has filed various motions and other papers. Of those motions, the Debtor requests an emergency hearing, to be scheduled between November 4, 2024 and November 8, 2024, if the Court’s schedule permits, on the following:

¹ The Debtor in this Chapter 11 case and the last four digits of its federal tax identification are: Prepaid Wireless Group, LLC (5159). The Debtor’s principal address is 1800-1 Rockville Pike, Rockville, MD 20852.

- (a) Motion of the Debtor and Debtor-In-Possession for Entry of an Order (I) Approving Cash Management System; (II) Authorizing the Debtors to Continue Using Existing Bank Accounts and Business Forms; and (III) Granting a Waiver of the Debtor's Compliance with Section 345(b) of the Bankruptcy Code; and
- (b) Motion of the Debtor and Debtor-In-Possession for Entry of an Order Extending the Time to File Schedules of Assets and Liabilities and Statement of Financial Affairs.

WHEREFORE, the Debtor respectfully requests that the Court schedule an emergency hearing between November 4, 2024 and November 8, 2024, if the Court's schedule permits, on the aforementioned motions.

Dated: October 21, 2024

COLE SCHOTZ P.C.

By: /s/ H.C. Jones III

Irving E. Walker (Bar No. 00179)
Gary H. Leibowitz (Bar No. 24717)
H.C. Jones III (Bar No. 20064)
J. Michael Pardoe (Bar No. 20730)
1201 Wills Street, Suite 320
Baltimore, MD 21231
(410) 230-0660
(410) 230-0667 (fax)
iwalker@coleschotz.com
gleibowitz@coleschotz.com
hjones@coleschotz.com
mpardoe@coleschotz.com

Proposed Counsel for Debtor and Debtors-In-Possession

CERTIFICATE OF SERVICE

I certify that this Notice of this Motion has been given to the following parties or to their counsel, if known: (i) the Office of the United States Trustee, (ii) T-Mobile, and (iii) all other parties identified on the Debtors' Lists of Twenty Largest Unsecured Creditors. The Debtor submits that, in light of the nature of the relief requested, no other or further notice need be given.

/s/ H.C. Jones III

H.C. Jones III, Esq.